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Attorney for Plaintiff
Judy Peatrowsky

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JUDY PEATROWSKY, an individual,

Plaintiff,

vs.

PRESOLVE, a limited liability company, and
DOES 1-10,

Defendant.

Case No.: 2:12-cv-00935-MMD
(VCF)

**EX PARTE REQUEST FOR
ADDITIONAL TIME TO FILE
REQUEST TO APPEAR PRO HAC
VICE AND TO FILE LATE JOINT
STATUS REPORT**

I, Andre L. Verdun, declare:

1. I am duly licensed as an attorney in the State of California and before the federal courts of the southern and central districts of California. I do not currently have a license to practice law in neither the State of Nevada nor the District Court of Nevada.

2. I have personal knowledge of the following facts and am competent to testify as to the truth of these facts if called as a witness.

3. This is a request to permit the late filing of the Joint Status Report and additional time to file the request to appear Pro Hac Vice.

4. On January 9, 2012, Plaintiff filed lawsuit in the United States District Court, Central District of California, Western Division.

5. On February 4, 2012, Defendant filed a motion to remove the case to the United States District Court, District of Nevada.

1 6. The motion to transfer the case to this district was granted on June 1, 2012.

2 7. The case was transferred to this court on June 7, 2012.

3 8. From the time the case was transferred until now, as attorney for Plaintiff, I was
5 making arrangements to find local counsel in Nevada and to obtain the documents
6 required to complete the request to appear Pro Hac Vice.

7 9. I recently located possible local counsel and immediately flew to Nevada to
8 meet local counsel and the Plaintiff in person to discuss representation.

9 10. Since that meeting, there has been an agreement between myself and Plaintiff
10 to retain the local counsel we previously met with. Subject to court approval, that local
11 counsel will be Craig Friedberg.

12 **JOINT STATUS REPORT**

13 11. On or about July 12, 2012 all counsel held a meet and confer regarding the
14 Joint Status Report.

15 12. I have agreed to draft the Joint Status Report and draft it to all parties to review,
16 approve and sign.

17 13. With all the work to obtain local counsel, the time ordered by the court to file a
18 Joint Status Report has lapsed. We expect to be able to file the report within days.

19 14. For this reason, I request that the court permit the late filing of the Joint Status
20 Report which we will file on or before July 17, 2012.

21 **REQUEST TO APPEAR PRO HAC VICE**

22 15. I have requested from the California State Bar a copy of a Certification of Good
23 Standing with the California State Bar. I have not received that document from the State
24 Bar as of today.

25 16. I expect the documents request to arrive shortly. I cannot complete an
26 application to appear PHV without first receiving the Certificate of Good standing.

27 17. I am unsure if I will have the Certificate of Good standing in time to file the
28 request to appear Pro Hac Vice by Monday, July 16, 2012.

1 18. I request that the deadline to file the request for Pro Hac Vice be moved from
2 July 16, 2012 till July 23, 2012 to ensure there is time to obtain the required certificate
3 and file the documents with the court in a proper manner.

5
6 I declare under the penalty of perjury that the forgoing is true and correct.

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8 Date: 3/29/2012

9 /s/ Andre L. Verdun
10 Andre L. Verdun,
11 Counsel for Plaintiff
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[PROPOSED] ORDER

The Court hereby reschedules the deadline to file the Joint Status Report and the Request to appear Pro Hac Vice. The Joint Status Report shall be filed by July 17, 2012. The Request to Appear Pro Hac Vice shall be filed by July 23, 2012.

IT IS SO ORDERED.

DATED:

Hon. Judge Miranda M. Du